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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
JULIAN SANTIAGO, and SUSAN LYNN
HARVEY individually and on behalf of all
other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL EXHIBIT TO
OPPOSITION TO MOTION FOR
SUMMARY JUDGMENT (DKT. 397-5)**

Judge: Hon. Richard Seeborg

Courtroom 3 – 17th Floor

Date: July 25, 2024

Time: 1:30 p.m.

Pursuant to the Court's May 8, 2024 Order for Omnibus Motion to Seal Summary Judgment Briefing, Plaintiffs file this motion to seal limited portions of Exhibit 4 to Plaintiffs' Opposition to Google's Motion for Summary Judgment, which includes excerpts from the Expert Report of Jonathan Hochman.

Document or Portion of Document Sought to Be Sealed	Party Claiming Confidentiality	Basis for Sealing
Exhibit 4 to the Mao Declaration in Opposition to Google's Motion for Summary Judgment (Dkt. 397-5), ¶¶ 182, 246 (portions highlighted in teal at Dkt. 397-5)	Plaintiffs	Refers to Sensitive Material Designated "Confidential" by Plaintiffs Pursuant to the Protective Order

Plaintiffs seek to seal only portions of Paragraphs 182 and 246 of this exhibit, which reveal Plaintiffs' sensitive identifiers including email address and ADID (a form of device identifier). The Court granted Plaintiffs' motion to seal this material in connection with class certification briefing. *See* Dkt. 353 at 20, 21. The resulting redacted, non-excerpted version of the Hochman Report was previously filed at Dkt. 361-58. As explained in Plaintiffs' earlier motion to seal, there is a compelling reason to seal this information because it would undermine the Plaintiffs' privacy interests. Dkt. 314 at 3; *see Nursing Home Pension Fund v. Oracle Corp.*, 2007 WL 3232267, at *2 (N.D. Cal. Nov. 1, 2007) ("an individual's privacy interest" is a compelling reason to seal a document). Plaintiffs' narrowly tailored proposal "will not interfere with the public's ability to understand the judicial process" because Plaintiffs are not seeking to redact any of Mr. Hochman's opinions. *Ojmar US, LLC v. Sec. People, Inc.*, 2016 WL 6091543, at *2 (N.D. Cal. Oct. 19, 2016).

Dated: June 28, 2024

Respectfully submitted,

By: /s/Mark C. Mao

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